

HEATHER E. WILLIAMS, #122664  
Federal Defender  
MEGHAN MCLOUGHLIN, #354051  
Assistant Federal Defender  
801 I Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814  
Tel: (916) 498-5700  
Fax: (916) 498-5710

Attorney for Defendant  
JOSE SANTANA AYON ARAGON

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:22-CR-00178-TLN
	)	
Plaintiff,	)	
	)	<b>STIPULATION TO CONTINUE</b>
vs.	)	<b>SENTENCING DATE; ORDER</b>
	)	
JOSE SANTANA AYON ARAGON	)	DATE: November 21, 2024
	)	TIME: 9:30 a.m.
	)	COURT: Hon. Troy L. Nunley
Defendant.	)	

---

Counsel for Defendant Jose Santana Ayon Aragon, by and through his counsel of record, Assistant Federal Defender Meghan D. McLoughlin, and Plaintiff United States of America, by and through its counsel of record, Assistant United States Attorney David Spencer, hereby stipulate as follows:

1. By previous order, this case was set for sentencing on November 21, 2024. Dkt. 95.
2. By this stipulation, defendant now moves to continue the sentencing hearing until February 13, 2025 at 9:30 a.m. The parties agree to the following schedule, with the concurrence of probation:

Judgment and Sentencing:	February 13, 2025
Reply/Statement of Non-Opposition:	February 6, 2025
Formal Objections to PSR:	January 30, 2025

Final PSR: January 23, 2025

Informal Objections to PSR: January 16, 2025

As this is a sentencing and a change of plea has already been entered, no exclusion of time under the Speedy Trial Act is required.

3. The parties agree and stipulate, and request that the Court find the following:

a) Counsel for defendant is investigating Mr. Ayon Aragon's pending cases and arrests, as detailed in the PSR, including confirming whether certain charges have been filed and contacting counsel of record in those cases. The significance of correctly reporting Mr. Ayon Aragon's criminal history and potentially resolving pending matters cannot be overstated, as it affects Bureau of Prisons security classification, facility placement, and eligibility for certain programming and halfway house placement upon release.

b) In addition, defense counsel is awaiting other information that is vital at sentencing.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

IT IS SO STIPULATED.

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Dated: October 23, 2024


/s/ Meghan D. McLoughlin  
MEGHAN MCLOUGHLIN  
Assistant Federal Defender  
Attorney for Defendant  
JOSE SANTANA AYON ARAGON

Dated: October 23, 2024

/s/ David Spencer  
DAVID SPENCER  
Assistant United States Attorney

**FINDINGS AND ORDER**

IT IS SO FOUND AND ORDERED this 28<sup>th</sup> day of October 2024.



---

TROY L. NUNLEY  
CHIEF UNITED STATES DISTRICT JUDGE